



EXXON COMPANY, U.S.A.

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CONTROLLER'S DEPARTMENT
OWNERSHIP & ROYALTY

W. L. STONE
REGULATORY AFFAIRS ADVISOR



March 21, 1996

Mr. David J. Guzy
Chief, Rules and Procedures Staff
Minerals Management Service
Royalty Management Program
P. O. Box 25165, MS 3101
Denver, Colorado 80225-0165

RE: Comments on MMS Advance Notice of Proposed Rulemaking
"Valuation of Oil From Federal and Indian Leases"

Dear Mr. Guzy:

Exxon Corporation ("Exxon") submits these comments in response to the Minerals Management Service's (MMS) Advance Notice of Proposed Rulemaking dated December 20, 1995. Exxon has substantial oil and gas production from its Federal and Indian leases and consequently has an interest in assisting the MMS with this Advance Notice of Proposed Rulemaking concerning the valuation of oil from Federal and Indian leases (ANPR).

However, Exxon is unable to comment at this time due to the pendency of litigation in various states concerning posted prices. Because many of the specific questions cited in this ANPR are being addressed by Exxon and other companies in the referenced litigation, there exists a formidable barrier to open discussion of the points covered at this time. Thus, we urge the MMS to withdraw the ANPR until such time that Exxon and other parties affected by an oil valuation rulemaking are free to comment. Should the MMS not withdraw the notice, we offer to comment in the future once our concerns about making this information public no longer exist or have been addressed.

Sincerely,

W. L. Stone

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